

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SONTERRA CAPITAL MASTER FUND LTD.,
FRONTPOINT EUROPEAN FUND, L.P.,
FRONTPOINT FINANCIAL SERVICES FUND,
L.P., FRONTPOINT HEALTHCARE FLAGSHIP
ENHANCED FUND, L.P., FRONTPOINT
HEALTHCARE FLAGSHIP FUND, L.P.,
FRONTPOINT HEALTHCARE HORIZONS FUND,
L.P., FRONTPOINT FINANCIAL HORIZONS
FUND, L.P., FRONTPOINT UTILITY AND
ENERGY FUND L.P., HUNTER GLOBAL
INVESTORS FUND I, L.P., HUNTER GLOBAL
INVESTORS FUND II, L.P., HUNTER GLOBAL
INVESTORS OFFSHORE FUND II LTD., HUNTER
GLOBAL INVESTORS SRI FUND LTD., HG
HOLDINGS LTD., HG HOLDINGS II LTD., and
FRANK DIVITTO, on behalf of themselves and all
others similarly situated,

Plaintiffs,

- against -

CREDIT SUISSE GROUP AG, CREDIT SUISSE AG,
JPMORGAN CHASE & CO., THE ROYAL BANK OF
SCOTLAND PLC, UBS AG, BLUECREST CAPITAL
MANAGEMENT LLP, DEUTSCHE BANK AG, DB
GROUP SERVICES UK LIMITED, AND JOHN DOE
NOS. 1-50,

Defendants.

Docket No. 15-cv-0871 (SHS)

**DECLARATION OF DANIEL KLAEY IN SUPPORT OF
CREDIT SUISSE AG'S MOTION TO DISMISS**

I, Daniel Klaey, hereby declare:

1. I am Director of Credit Suisse AG ("CSAG"). I submit this declaration in further support of CSAG's motion to dismiss the above-captioned action for lack of personal jurisdiction. I set forth the facts below to the best of my knowledge based upon my review of CSAG's records.

2. CSAG is a financial institution incorporated under the laws of Switzerland. Its headquarters is and has been located at Paradeplatz 8, 8001 Zurich, Switzerland. CSAG's principal place of business is and has been in Switzerland.

3. CSAG has 19 branches and 17 representative offices worldwide

4. In the United States, CSAG has a New York branch, and representative offices in Los Angeles, San Diego, and San Francisco, California.

5. CSAG has direct and indirect subsidiaries in the United States, of which Credit Suisse Holdings (USA), Inc. is the highest level United States holding company.

6. In 2014, a minority of CSAG's consolidated net revenue (including net revenues of all direct and indirect subsidiaries) was attributable to the United States.

7. At the end of 2014, CSAG reported 20,400 (FTE) employees, 16,100 (FTE) employees in Switzerland, and 4,300 (FTE) employees abroad. CSAG had 114 (FTE) employees in the United States.

8. The London Branch of CSAG was responsible for the CHF LIBOR submissions, and all of the employees who made the submissions were located in London.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 17th day of August 2015 in Zurich, Switzerland.

By:



Daniel Kläy